REMARKS

The Examiner is thanked for the thorough examination of the present application. The Office Action, however, tentatively rejected all claims 1-36. In response, Applicant submits the foregoing amendments and the following remarks. In particular, independent claims 1, 10, 19 and 28 have been amended. Applicant submits that no new matter has been added to the application by these amendments. Applicant requests reconsideration and withdrawal of the rejections for at least the following reasons.

Rejections under 35 U.S.C 112

The Office Action rejected claims 1, 10, 19, and 28 under 35 U.S.C. § 112, second paragraph, because certain terms were deemed to be indefinite. Claims 1, 10, 19 and 28 have been amended to overcome the rejections under 35 U.S.C 112. Accordingly, the rejections should be withdrawn. Applicant notes, however, that it does not under stand how or what the term "periodically" is indefinite. Like any other term that is not expressly defined in the specification, this term should merely be construed in accordance with its common dictionary meaning.

Rejections under 35 U.S.C 103(a)

Claims 1-36 are rejected under 35 U.S.C 103(a) as allegedly being unpatentable over Yang et al (2003/0233290) in view of Wang et al (2005/0038684). These rejections are respectfully traversed.

In regard to claims 1, 10, 19 and 28, Yang and Wang do not teach or suggest all features of the claimed embodiments. Specifically, Yang and Wang fail to disclose, suggest, or teach, *inter alia*, the following feature recited by above claims of the present application:

> "***picking an order corresponding to a product, picking the first lot corresponding to the same product having WIP status, and generating a pre-picked invoice including the order and the first lot***";
> "*determining whether the first lot has achieved F/G (Finished Goods) status at a first shipping time*"; and
> "***automatically generating a first real invoice corresponding to the pre-picked invoice for the order and the first lot*** *if the first lot has achieved F/G status*".

In the claimed embodiments, a **pre-picked invoice can be first generated for an order and at least one lot being manufactured.** When the lot specified by the pre-picked invoice has achieved F/G**, the pre-picked invoice can be automatically and immediately transformed into a real invoice.** More particularly, an order corresponding to a product is first selected (picked), and at least a lot corresponding to the same product is then selected (picked). After the picking, a **pre-picked invoice is generated for the selected order and lot.** Thereafter, the status of the selected lot is periodically checked to determine whether the status of the selected lot is changed from the WIP status to the F/G status. Once the status of the selected lot has been changed from the WIP status to the F/G status, **the pre-picked invoice is transformed to automatically generate a real invoice for the selected order and lot.**

The Examiner alleged that paragraph [0024] of the Yang reference discloses WIP reports, that paragraph [0018] of the Yang reference discusses finished goods

rolling output reports, WIP inventory reports, and other reports, that paragraph [0103] of the Yang reference discloses: "6 Status of a Lot Inconsistent with WIP Quantity, and that paragraph [0052] of the Wang reference discloses that it "may perform automatic pick, pre-pick, and other function". In the Yang reference, WIP reports are provided, and lot tracking disclosed in [0024] of the Yang reference means the relationships between the lots (parent lots and child lots), and performed accordingly. It is understood that, several reports may be provided during manufacturing. However, the use of these reports is more important than themselves. As described, in the claimed embodiments, a pre-picked invoice is first generated for an order and at least one lot being manufactured, and the pre-picked invoice is automatically and immediately transformed into a real invoice when the lot specified by the pre-picked invoice has achieved F/G. Nowhere in the Yang reference does it disclose the claimed feature of "generating a pre-picked invoice including the order and the first lot, and automatically generating a first real invoice corresponding to the pre-picked invoice for the order and the first lot if the first lot has achieved F/G status".

In contrast to the claimed embodiments, paragraph [0020] of the Yang reference states "In the semiconductor manufacturing industry in order to procure finished goods (for example a finished semicondcutor chip), a buyer first orders wafers from a Fab supplier (foundry); once the work at the Fab supplier is finished, the buyer orders sorting from a Wafer Sort supplier; after the Wafer Sort work is finished, the buyer orders Assembly from an Assembly supplier; and finally, the buyer orders Final Test from a Final Test supplier. The supply chain management system is able to perform group order generation for groups of dependent suppliers (such as Fab, Wafer Sort, Assembly

and Final Test suppliers) in the supply chain". It is noted that, Yang discloses the standard procedure of supply chain management, but nowhere does Yang disclose the generation of a pre-pick invoice, and the transformation of the pre-pick invoice for generating a corresponding real invoice when the lot specified by the pre-pick invoice has achieved F/G status.

Similarly, paragraph [0048] of the Yang reference discloses an example of a finished goods rolling output report with package planning. However, nowhere does Yang disclose the generation of a pre-pick invoice, and the transformation of the pre-pick invoice for generating a corresponding real invoice when the lot specified by the pre-pick invoice has achieved F/G status.

Additionally, paragraphs [0127]-[0128] of the Yang reference states: "2. Consistency Between WIP and Production Order. For example, Production Order No, Device, Item No, and Qty in WIP should match with the production order information. 3. Consistent Between DTR and Production Order. For example, production order no, device, item no, and qty in DTR should match with the production order information". It is clear that, Yang only relevantly discloses the product order information should be matched with the information in WIP and DTR, thus to maintain the data consistency. However, nowhere does Yang disclose the generation of a pre-pick invoice, and the transformation of the pre-pick invoice for generating a corresponding real invoice when the lot specified by the pre-pick invoice has achieved F/G status.

Further still, as described in the previous responses, paragraph [0202] of the Yang reference only relevantly discloses when WIP status is complete, an invoice is received, and waited for approval. Nowhere in the Yang reference does it disclose the

concept and features of the pre-picked invoice, and the transformation of the pre-picked invoice (automatically generating a real invoice corresponding to the pre-picked invoice for the order and the first lot if the first lot has achieved F/G status). For at least these reasons, the rejections should be withdrawn.

In addition, the Examiner alleged that the term "pre-pick" in the Wang reference is equated to the claimed feature of "generating a pre-picked invoice including the order and the first lot". Applicant respectfully disagrees. Only a term "pre-pick" is present in the Wang reference, and no more detail is discussed. Should the Examiner disagree, Applicant respectfully requests the Examiner to provide more clear evidence to verify the above assertions.

Since Yang and Wang fail to teach the claimed features above of the claimed embodiments, claims 1, 10, 19 and 28 are patentable over the cited reference. Insofar as claims 2-9 depend from claim 1, claims 11-18 depend from claim 10, claims 20-27 depend from claim 19, and claims 29-36 depend from claim 28 are similarly believed to be patentable. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988). Further, dependent claims are also patentable based on their own features.

In view of the foregoing remarks, the applicant respectfully requests the Examiner's reconsideration of the application and the timely allowance of claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition

for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and Official Notice, or statements interpreted similarly, should not be considered well-known for the particular and specific reasons that the claimed combinations are too complex to support such conclusions and because the Office Action does not include specific findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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